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*Attorneys for Defendants  
Renee Baker, Tamara Bartel, Dwayne Baze,  
Kelly Belanger, Quentin Byrne, Tara Carpenter,  
Melina Castro, James Dzurenda, Timothy Filson,  
Sheryl Foster, Starlin Gentry, Todd Gilliland,  
James Keener, E.K. McDaniel, Ramon Olivas,  
Valaree Olivas and William Sandie*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

DOUGLAS SHIELDS,

Plaintiff,

vs.

RENEE BAKER, et al.,

Defendants.

Case No. 3:18-cv-00031-MMD-WGC

**ORDER GRANTING  
DEFENDANT'S MOTION FOR  
EXTENSION OF TIME TO FILE A REPLY  
TO PLAINTIFF'S OPPOSITION TO  
DEFENDANT'S MOTION FOR SUMMARY  
JUDGMENT (ECF NO. 92)  
(FIRST REQUEST)**

Defendants Renee Baker, Tamara Bartel, Dwayne Baze, Kelly Belanger, Quentin Byrne, Tara Carpenter, Melina Castro, James Dzurenda, Timothy Filson, Sheryl Foster, Starlin Gentry, Todd Gilliland, James Keener, E.K. McDaniel, Ramon Olivas, Valaree Olivas and William Sandie, by and through counsel, Aaron D. Ford, Nevada Attorney General, and Andrea M. Dominguez, Deputy Attorney General, hereby move this Court for an extension of time file a Reply to Plaintiff's Opposition to Defendant's Motion for Summary Judgment. This Motion is made and based upon Federal Rule of Civil Procedure 6(b)(1)(A), the attached Points and Authorities, the papers, and pleadings on file herein, and such other and further information as this Court may deem appropriate.

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**MEMORANDUM OF POINTS AND AUTHORITIES**

**I. FACTUAL ANALYSIS**

This is an inmate civil rights action brought pursuant to 42 U.S.C. § 1983. Douglas Shields (Shields) is an inmate in the custody of the Nevada Department of Corrections (NDOC), currently housed at Lovelock Correctional Center, (LCC).

On August 28, 2020 Defendants' filed a Motion for Summary Judgment. (ECF No. 79.) On November 30, 2020 Shields filed an Opposition to Defendants' Motion for Summary Judgment. (ECF No. 92).

As counsel for Defendants was only recently assigned this case, Defendants respectfully request an extension of time of forty-five days to file a Reply to Plaintiff's Opposition to Defendant's Motion for Summary Judgment. Counsel requires additional time to familiarize herself with the claims, the motion for summary judgment, the opposition to the motion for summary judgment, and the case in general.

Federal Rule of Civil Procedure 6(b)(1) governs extensions of time and provides as follows:

When an act may or must be done within a specified time, the court may, for good cause, extend the time: (A) with or without motion or notice if the court acts, or if a request is made, before the original time or its extension expires; or (B) on motion made after the time has expired if the party failed to act because of excusable neglect.

Defendants' request is timely and will not hinder or prejudice Shield's case. It will allow for a thorough opportunity to review the case file and pending motions. Further, Shield's Opposition is 488 pages long. Therefore, Shield's will not be prejudiced by a forty-five-day delay to respond to his opposition. Shield's himself has received a seventy-five-day extension of time to respond to Defendants' motion for summary judgment.

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1 Defendants assert that the requisite good cause is present to warrant the requested  
2 extension of time. Therefore, the Defendants respectfully request an extension, until  
3 **January 28, 2021**, to file their Reply.

4 DATED this 14th day of December, 2020.

5 AARON D. FORD  
6 Attorney General


7 By:

  
8 ANDREA M. DOMINGUEZ, Bar No. 15209  
9 Deputy Attorney General

10 *Attorneys for Defendants*

11 IT IS SO ORDERED.

12 DATED: December 15, 2020.

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15 UNITED STATES MAGISTRATE JUDGE  
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